

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

COMMISSIONER OF THE DEPARTMENT OF
LICENSING AND CONSUMER AFFAIRS; and
GOVERNMENT OF THE UNITED STATES VIRGIN
ISLANDS,

CASE NO. 1:25-CV-00024

Plaintiffs,

v.

PEPSICO, INC.;
PEPSICO CARIBBEAN, INC.;
THE COCA-COLA COMPANY; and
CC ONE VIRGIN ISLANDS, LLC,

Defendants.

**MOTION FOR ELIZABETH PAIGE BOGGS TO APPEAR ON BEHALF OF THE
GOVERNMENT OF THE VIRGIN ISLANDS**

In accordance with Rule 83.1(b)(7) of the District Court Local Rules of Civil Procedure, Assistant Attorney General Jalicha Persad, Attorney General authorized designee, moves for the admission of Elizabeth Paige Boggs of the law firm Motley Rice, LLC, located at 401 9th Street NW, Suite 630, Washington D.C. 20004; telephone number (202) 386-9629, for purposes of appearing as co-counsel on behalf of the Commissioner of the Department of Licensing and Consumer Affairs and the Government of the United States Virgin Islands in this matter. In support thereof, AAG Persad states as follows:

1. Attorney Boggs is a member of good standing in Illinois, Indiana and the District of Columbia. *See Pro Hac Vice* Application, attached as **Exhibit 1**; Certificates of Good Standing, attached as **Exhibit 2**.
2. Attorney Boggs is not under suspicion or disbarment by any court. *See Exhibit 1*; Declaration of Elizabeth Paige Boggs, attached as **Exhibit 3**.

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3. The undersigned is an authorized designee of the Attorney General of the Virgin Islands, permitted to move for Attorney Boggs to appear and participate in any proceeding in which they are representing the Government of the Virgin Islands or any of its officers or agencies.
4. On information and belief, Attorney Boggs is fully qualified to appear on behalf of the Government of the Virgin Islands before this Court.
5. Pursuant to LRCi 7.1(f), the undersigned certifies that she has sought the concurrence of all parties to this motion. Defendants do not oppose the filing of this motion.
6. The \$250 fee for Attorney Boggs' admission to appear on behalf of the Government of the Virgin Islands will be paid to the Clerk of this Court contemporaneously with the filing of this Motion. A proposed order is attached for the Court's consideration.

WHEREFORE, the Government respectfully requests that this Court enter an Order granting Elizabeth Paige Boggs admission to appear before this Court on its behalf for all purposes relating to the proceedings in this matter.

Dated: June 16, 2025

RESPECTFULLY SUBMITTED,

/s/ Jalicha Persad, Esq.

Jalicha Persad, Esq.

Civil Division

Virgin Islands Department of Justice

Office of the Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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